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*Attorneys for Defendant*  
H & M HENNES & MAURITZ, L.P.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SUZANNE TRAN, individually and on  
behalf of all person similarly situated,

Plaintiff,

vs.

H & M HENNES & MAURITZ, L.P.,  
and DOES 1 through 100, inclusive,

Defendants.

No. C 12-00555 EJD

STIPULATION FOR ORDER TO  
REMAND MATTER TO STATE  
COURT

~~PROPOSED~~ ORDER

TO THE HONORABLE EDWARD J. DAVILA, UNITED STATES  
DISTRICT JUDGE:

Defendant H & M HENNES & MAURITZ, L.P. ("Defendant") and Plaintiff  
SUZANNE TRAN ("Plaintiff"), by and through their counsel of record, submit the  
following Stipulation.

(1) WHEREAS Based on what is known at this time before discovery has  
been conducted, Plaintiff has represented that she presently intends to pursue claims  
in this case that are limited to amounts allegedly recoverable as a result of situations  
in which a non-exempt management employee could not take a meal period due to

1 being the only management employee on duty;

2 (2) WHEREAS Plaintiff has represented that the proposed class definition  
3 for the new class will be: "All individuals who are currently employed, or formerly  
4 have been employed by Defendant as non-exempt store management employee in  
5 the positions of supervisor, department manager, assistant manager and/or store  
6 manager and worked in Defendant's stores in the State of California, at any time  
7 within four years prior to the filing of the original complaint until resolution of this  
8 action"; and

9 (3) WHEREAS Plaintiff has represented that, in her amended complaint,  
10 she will state that she currently "believes that the total recovery in this action will  
11 not exceed 5 Million" but this does not prevent Plaintiff from amending the  
12 representation at a later date nor Defendant's right to revisit removal in the event of  
13 any such amendment.

14 IT IS HEREBY STIPULATED by the Parties, through their counsel of  
15 record, as follows:

16 The above-entitled matter shall be remanded to the Superior Court for the  
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1 State of California, County of Santa Clara.

2 Dated: March 15, 2012

Respectfully submitted,  
MANATT, PHELPS & PHILLIPS, LLP

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5 By: 

6 Andrew Satenberg  
7 Attorneys for Defendant  
H & M HENNES & MAURITZ, L.P.

8 Dated: March 15, 2012

Respectfully submitted,  
RIGHETTI - GLUGOSKI P.C.

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11 By: 

12 JOHN GLUGOSKI  
13 Attorneys for Plaintiff SUZZANE TRAN  
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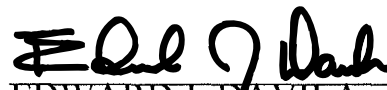
~~[PROPOSED]~~ ORDER

The Court having read the foregoing Stipulation for Order to Remand Matter to State Court, it is hereby ORDERED that,

The matter entitled *Tran v. H & M Hennes & Mauritz, L.P.*, Case No. C 12-00555 EJD is hereby remanded to the Superior Court for the State of California, County of Santa Clara.

The Clerk shall close this file.

Dated: March 19, 2012



EDWARD J. DAVILA  
UNITED STATES DISTRICT JUDGE